

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit 7

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA
STATE CONFERENCE OF
THE NAACP, et al,

Plaintiffs,

vs.

CASE NO.

3:21-CV-03302-MBS-TJH-RMG

THOMAS C. ALEXANDER,
et al,

Defendants.

VIDEOCONFERENCE

DEPOSITION OF: WILLIAM ROBERTS

DATE: July 7, 2022

TIME: 9:35 a.m.

LOCATION: 1310 Gadsden Street
Mahogany Conference Room
Columbia, SC

TAKEN BY: Counsel for the Plaintiffs

REPORTED BY: ERIC GLAZIER, Court Reporter

1 who was involved in drawing maps for congressional
2 redistricting on how that history might play into
3 congressional districts?

4 A. Not that I recall at this point.

5 Q. Do you understand the history of
6 discrimination at all to factor into compliance
7 with Section 2 of the Voting Rights Act?

8 DEFENSE COUNSEL: John, I'm going
9 object to that to the extent it calls for a legal
10 opinion, since the witness is not a lawyer.

11 MR. CUSICK: Yep.

12 THE WITNESS: Could you repeat the
13 question?

14 BY MR. CUSICK:

15 Q. In your work from a technical side, in
16 compliance with Section 2, do you at all consider
17 history when you were drawing congressional maps?

18 A. Not when we were drawing congressional
19 maps. We didn't look at the historic history of
20 discrimination, no.

21 Q. Do you recall public testimony saying
22 that's a factor that should matter?

23 A. I don't recall at this moment.

24 Q. Did you look at any political
25 characteristics for communities of interest?

1 minority candidate of choice.

2 Q. And do you have any understanding on
3 whether an RPV analysis is helpful for that
4 determination?

5 A. I don't know. I've never conducted a
6 racially polarized voting analysis.

7 Q. Have you worked on any redistricting
8 efforts where an RPV analysis was conducted?

9 A. I don't recall.

10 Q. And did I hear you don't recall whether
11 it was at all discussed in any of the federal cases
12 that you worked on as a technical advisor?

13 A. That's correct. I don't recall if it
14 was -- I never analyzed any RPV analysis.

15 Q. Even if you didn't conduct an analysis,
16 are you aware that cartographers who draw maps do
17 look at RPV analyses?

18 A. Could you repeat that question?

19 Q. Even if you didn't conduct an RPV
20 analysis, based on your expertise in the field, are
21 you aware that map drawers might look to RPV
22 analyses when they're drawing maps?

23 A. Yes.

24 Q. And what is your understanding on why
25 they might do that?